

**SULLIVAN & CROMWELL LLP**

James L. Bromley (NJ Bar No. 1551996)  
Andrew G. Dietderich (*pro hac vice*)  
Brian D. Glueckstein (*pro hac vice*)  
Benjamin S. Beller (*pro hac vice* to be filed)  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
E-mail: bromleyj@sullcrom.com  
dietdericha@sullcrom.com  
gluecksteinb@sullcrom.com  
bellerb@sullcrom.com

*Counsel for the FTX Debtors*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

BLOCKFI INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

Ref. Nos. 1376

**RESERVATION OF RIGHTS OF THE FTX DEBTORS IN CONNECTION WITH THE  
BLOCKFI DEBTORS' NINTH OMNIBUS OBJECTION TO THE FTX CLAIMS**

FTX Trading Ltd. ("FTX Trading") and its affiliated debtors and debtors-in-possession (collectively, the "FTX Debtors")<sup>2</sup> hereby submit this reservation of rights in connection with the

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the BlockFi Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

<sup>2</sup> The last four digits of FTX Trading Ltd.'s tax identification number is 3288. Due to the large number of debtor entities in the FTX Debtors' chapter 11 cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

BlockFi Debtors' *Ninth Omnibus Objection to the FTX Claims* [Docket No. 1376] (the "Reservation of Rights" and such claims objection, the "Claim Objection")<sup>3</sup>, filed by the debtors and debtors-in-possession (collectively, the "BlockFi Debtors") in the above-captioned chapter 11 cases (the "BlockFi Chapter 11 Cases") and respectfully state as follows:

### **RESERVATION OF RIGHTS**

1. The issues facing the FTX Debtors and the BlockFi Debtors are complex and have major implications for two separate significant chapter 11 cases. With that in mind, the FTX Debtors have worked to engage with the BlockFi Debtors in good faith to reach a resolution with respect to the parties' various disputes, and will continue to do so. While the Claim Objection as filed provided for an objection deadline of September 13<sup>th</sup>, 2023 and a hearing on the merits on September 20<sup>th</sup>, 2023, following a meet and confer between the FTX Debtors and the BlockFi Debtors, the FTX Debtors understand that the Claim Objection will not be going forward on September 20, and instead the parties will appear for a conference with the Court. The parties have also agreed to confer with respect to an appropriate litigation schedule for the Claim Objection.

2. With that understanding and agreement, the FTX Debtors file this reservation of rights with respect to all rights, claims, arguments, defenses, and remedies with respect to the Claim Objection, the Estimation Motion, the FTX Claims, or any other issue raised in the BlockFi Chapter 11 Cases, and will respond in substance to the Claim Objection once a fair and reasonable litigation schedule is set.

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<sup>3</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Claim Objection.

Dated: September 13, 2023  
New York, New York

/s/ James L. Bromley

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125 Broad Street

New York, New York 10004

Telephone: (212) 558-4000

Facsimile: (212) 558-3588

E-mail: bromleyj@sullcrom.com

dietdericha@sullcrom.com

gluecksteinb@sullcrom.com

bellerb@sullcrom.com

*Counsel for the FTX Debtors*